

December 16, 2021

Hon. Paula Xinis  
U.S. District Court for the District of Maryland  
6500 Cherrywood Lane, Suite 400  
Greenbelt, MD 20770

Re: *CASA v. Mayorkas*, 8:20-cv-2118-PX  
Joint letter re: pending summary judgment motions

Dear Judge Xinis:

At the December 7, 2021, status conference, the Court inquired as to whether the pending summary judgment motions are ripe and directed the parties to meet and confer on the issue. The parties jointly submit that the motions are ripe, and respectfully request that the Court adjudicate these motions rather than direct the parties to brief other claims. With respect to the Timeline Repeal Rule, both sides have moved for summary judgment on the Administrative Procedure Act (“APA”) claims and the Homeland Security Act (“HSA”) claims, and the issues are ripe for adjudication. With respect to the Broader EAD Rule, the Court’s adjudication of the HSA claim in Plaintiffs’ favor will dispose of the challenge to that Rule, obviating the need for briefing on the remainder of the claims directed to that rule.

Plaintiffs further request that, given the ongoing harms to our clients, should the Court decide to postpone decision on any of the summary judgment motions in order to request briefing on the remaining claims, the Court proceed with deciding Plaintiffs’ motion to modify the preliminary injunction. Dkt. 107.

This submission is not intended to indicate the parties’ position on the need for or the timing of oral argument, which is addressed in separate filings.

Respectfully submitted,

/s/

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/s/

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